

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Crim. No. 05-cr-10004 PBS |
| |) | |
| OLEKSIY SHARAPKA |) | |
| Defendant. |) | |

JOINT MOTION TO CONTINUE SENTENCING

The United States, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant United States Attorney Seth P. Berman, and the defendant, by and through his attorney Frank Fernandez, move to continue the sentencing currently scheduled for August 4, 2006 to on or after October 3, 2006. As grounds therefore the parties state that sentencing in this matter is complicated by the parties' disagreement regarding the appropriate loss associated with defendant's criminal conduct, conduct that occurred in multiple jurisdiction and included the participation of numerous unindicted individuals. The parties need this additional time to review discovery related to the government's calculation of loss, in the hopes that the parties can agree on the proper amount of loss attributable to the defendant's conduct, thereby potentially obviating the need for an evidentiary hearing in this matter.

WHEREFORE, the parties respectfully request that sentencing in this matter be continued until on or after October 3, 2006.

Respectfully Submitted,

MICHAEL J. SULLIVAN
United States Attorney
By:

/s/ Seth P. Berman
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OLEKSIY SHARAPKA
By his attorney

/s/ Frank Fernandez
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June 20, 2006